

**AFFVT**  
LESLIE MARK STOVALL, ESQ.  
Nevada Bar No. 2566  
ROSS H. MOYNIHAN, ESQ.  
Nevada Bar No. 11848  
STOVALL & ASSOCIATES  
2301 Palomino Lane  
Las Vegas, NV 89107  
Telephone: (702) 258-3034  
Facsimile: (702) 258-0093  
[court@lesstovall.com](mailto:court@lesstovall.com)  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT NEVADA**

KATHERINE MAYORGA, individually, )  
Plaintiff, )  
vs. )  
CRISTIANO RONALDO, individually, )  
Does I-XX and Roe Corporations I-XX; )  
Defendant (s). )

2:19-cv-00168-JAD-CWH

**AFFIDAVIT OF LESLIE MARK STOVALL, ESQ. IN SUPPORT OF THE  
APPLICATION FOR ORDER FOR ALTERNATIVE SERVICE**

STATE OF NEVADA)

) ss:

COUNTY OF NYE )

COMES NOW LESLIE MARK STOVALL, ESQ, who after first being duly sworn,  
deposes and says:

1. On September 27, 2018 the plaintiff's complaint was filed in the Clark County District Court seeking damages from Cristiano Ronaldo for a sexual assault (sodomy) that occurred on June 13, 2009 in Las Vegas Nevada, an ongoing fraud and conspiracy arising from a purported settlement agreement in 2010, and the breach of that settlement agreement and defamation occurring in 2017. Due to limitations in service under NRCP 4 the Plaintiff filed her complaint in this court on January 27, 2019.

1           2. Defendant Cristiano Ronaldo is a Portuguese citizen and a professional soccer player.  
2     The defendant played soccer for Manchester United Soccer Club in England, from 2005 to 2009.  
3     In 2005, defendant was arrested for allegedly raping a woman at the Sanderson Hotel in London,  
4     England. Attached hereto as *Exhibit 1* (AFFT 00003) and incorporated herein by reference is the  
5     Sun Sport is reporting the arrest of defendant in 2005.

6           3. In 2009 the defendant contracted to play soccer with the Real Madrid Soccer Club.  
7     Following the announcement of the Real Madrid contract the defendant visited Las Vegas.  
8     During this visit the defendant sexually assaulted the plaintiff.

9           4. In 2015 "Football Leaks" published information regarding soccer players and teams  
10    financial dealings which eventually lead to the prosecution of the defendant for tax fraud in  
11    Spain. On June 15, 2018 the Washington Post reported that:

12                   Portuguese soccer star Cristiano Ronaldo reached a deal with Spanish  
13                   prosecutors in his tax evasion case, agreeing to a massive fine and  
14                   prison sentence, though he is unlikely to serve any time because he's  
15                   a first time offender....Ronaldo, who played for La Liga Titan Real  
16                   Madrid since 2009, was accused by Spanish authorities of evading  
17                   €14.7 million about \$17.1 million in taxes between 2011 and 2014.  
18                   Prosecutors allege that Ronaldo set up a company in 2010 to manage  
19                   his image rights in the British Virgin Island then transferred those  
20                   rights to a second company in Ireland, solely for the purpose of  
21                   creating a screen to confuse Spanish tax authorities.

22                   Under the agreement, that amount was reduced to €5.7 million (about  
23                   \$6.6 million) he will pay a fine of €18.8 million (about \$21.8 million)  
24                   but likely will not head to prison, because under Spanish law, first-  
25                   time offenders who are sentenced to less than two years may serve  
26                   their time on probation.

27     Attached hereto as *Exhibit 2* (AFFT 00005) and incorporated herein by reference is the  
28     June 15, 2018 Washington Post article reporting defendant's plea agreement.

29           5. It was widely reported in the Spanish media that the tax fraud case influenced  
30     Ronaldo's decision to move to Juventus soccer club in July, 2018, in Turin (Torino), Italy.  
31     Attached hereto as *Exhibit 3* (AFFT 00009) and incorporated hereby reference is the Financial  
32     Times article regarding the defendant's decision to move to Juventus soccer club.

33           6. The address of the defendant's residence is not known. In 2017 Sport. One reported in

an article entitled “The Most Expensive Houses Owned By Cristiano Ronaldo” that the defendant owned the following residential properties:

1. La Finca Mansion, Spain

“Ronaldo’s La Finca residence has a price tag of 6.2 million”... “It comes as no surprise that a world renowned personality like Cristiano would buy a house in La Finca, which is a very private, highly secure place. The paparazzi cannot easily get in, which is advantageous to a big star like CR7. Security cameras are positioned along the roads to monitor who goes in and out of the village, plus the houses are being shielded from the public view with the help of metal fences that stand eight feet tall.”

2. Trump Tower, New York

“Anyway, Ronaldo’s NYC apartment (measures 2509 ft.<sup>2</sup>) is located in Trump Tower, and is part of the buildings “L – Line” spaces. Well, the ones included in this special category have a nice view of the Hudson River, the Empire State building, in Central Park to name a few. That being said apartments in this ‘clique’ are madly expensive. Cristiano is priced a dizzying \$18.5 million, and was designed by Juan Pablo Molyneux, whose expertise is maximalism”... “This property was previously owned by Donald Trump’s business partner, and Italian tycoon named Alessandro Proto.”

3. Alderly Edge Mansion, England

“The real Madrid player bought it back in 2006 for \$6 million. The five-story mansion includes five bedrooms, bathrooms for him and her, and has mirrored ceilings as well. It also has a media room and a cinema, as well as an indoor swimming pool, Jacuzzi and gym. It is surrounded by tall gates as well as high security fence to protect his privacy, especially from the paparazzi.”

4. Coco Bay Towers, Vietnam

“The Real Madrid star officially became the first resident of the Coco Bay Towers in Vietnam. Prices of units at Coco Bay range from VND 1,615,000,000 for a one-bedroom 45sqm unit to VND 4,068,000,000 for the two-bedroom 82sqm unit.”

Attached hereto as ***Exhibit 4*** (AFFT 00012-18) and incorporated herein by reference is the Sports One Article regarding the defendant’s most expensive houses.

7. In July 2018 it was announced the defendant had contracted to play soccer with Juventus Soccer Club located in Turin (Torino) Italy. Attached hereto as ***Exhibit 5*** (AFFT 00018-19) and incorporated herein by reference is the Forbes article in reporting the defendant’s contract and transfer to Juventus Soccer Club.

8. In late July 2018 it was reported that defendant was looking for a place to live in Turin

1 Italy. On October 10, 2018 the Goal published an article entitled “Cristiano Ronaldo’s House:  
2 Where Does the Juventus Player Live?” which stated:

3 Ronaldo is believed to have made two connected villas his new base in  
4 the north of Italy. According to the Gazzetta dello Sport, the Portuguese  
5 captain’s new home is situated in the hills above Gran Madre de Dio in  
6 the heart of Turin and, as you might expect is accessible only via a  
7 private road.

8 Privacy is clearly a key consideration for Ronaldo and the buildings are  
9 shielded from prying eyes through lush leaves of trees and vegetation  
10 which is dotted around the property.

11 Attached hereto as **Exhibit 6** (AFFT 00026) and incorporated herein by reference is the  
12 Goal article regarding the defendant’s house in the Hills of Gran Madre De Dio.

13 9. The defendant has personal knowledge of the summons and complaint filed by the  
14 plaintiff on September 27, 2018. The defendant and his surrogates, including the Juventus Soccer  
15 Club, have publicly commented on the allegations set forth in the complaint to international news  
16 agencies and on social media. On October 2, 2018, CNN reported the following:

17 Ronaldo’s representatives denied the rape allegations when German  
18 publication Der Spiegel first reported them in 2017. After the outlet broke  
19 news of the lawsuit Friday in an interview with Mayorga, Ronaldo’s  
20 lawyer called the reporting “blatantly illegal”. “It violates the personal  
21 rights of our client Cristiano Ronaldo in an exceptionally serious way.  
22 This is an inadmissible reporting of suspicions in the area of privacy”,  
23 lawyer Christian Schertz said in a statement. Ronaldo appeared to dispute  
24 the claims in an Instagram live post on Friday: “What they said today, fake  
25 – fake news. They want to promote by my name. It’s normal. They want  
26 to be famous – to say my name. Yeah but it’s part of the job. I’m (a) happy  
27 man and all, all good.

28 Attached hereto as **Exhibit 7** (AFFT 00033) and incorporated herein by reference is the  
October 3, 2018 CNN Wire article.

10. On October 3, 2018 the Independent reported that, “Taking to Twitter on Wednesday,  
Ronaldo said: ‘I firmly deny the accusation being issued against me’” Attached hereto as **Exhibit**  
**8** (AFFT 00039) and incorporated herein by reference is the Independent article of October 3,  
2018.

11. On October 10, 2018 USA Today published the plaintiff’s complaint filed in the

1 Clark County District Court on it's website and Ronaldo's October 3, 2018 denial of those  
2 allegations. USA Today then reported the following:

3 Mr. Ronaldo has always maintained, as he does today, that what  
4 occurred in 2009 in Las Vegas was consensual in nature, attorney Peter  
Christiansen said in a statement to USA Today Sports and other outlets  
5 on Wednesday.

6 Christiansen confirmed that Mayorga reached a settlement with  
7 Ronaldo's representatives in 2010. The lawsuit seeks to void that  
\$375,000 settlement, which included a non-disclosure agreement.

8 While Mr. Ronaldo does not deny the existence of a mutual agreement  
9 and release, his motivations for agreeing to that resolution have been  
10 twisted to say the least, Christiansen said. Far from any admission of  
guilt or alternative motive Mr. Ronaldo was advised to privately resolve  
the allegations against him in order to avoid the inevitable attempts that  
are now being made to destroy his reputation that has been built on hard  
work, athleticism and honor.

11 Attached hereto as **Exhibit 9** (AFFT 00045) and incorporated herein by reference is the  
12 USA Today October 10, 2018 article.

13 12. On October 10, 2018 BBC Sport reported the following statements by Peter  
14 Christiansen, Esq.:

15 "Cristiano Ronaldo has mandated his lawyers in the United States and  
16 Europe to deal with all legal aspects and expresses full confidence that  
the truth will prevail, despite the corruption of counter information and  
17 in which the laws of Nevada will be enforced and respected."

18 "So there is no doubts: Cristiano Ronaldo vehemently denies all  
19 accusations in the civil action, in consistency with what he has done in  
the last nine years."

20 "The documents allegedly contain statements by Mr. Ronaldo and were  
21 reproduced in the media are pure inventions."

22 "By 2015, dozens of entities (including law firms) in different parts of  
Europe were attacked and their electronic data stolen by a cyber  
23 criminal. This hacker tried to sell such information, and immediate  
outlet irresponsibly ended up publishing some of the stolen documents,  
24 significant parts of which were altered and or completely fabricated."

25 "Once again for the avoidance of doubt, Cristiano Ronaldo's position  
has been and continues to be that what happened in 2009 in Las Vegas  
26 was completely consensual."

27 Attached hereto as **Exhibit 10** (AFFT 00048-49) and incorporated herein by reference

1 is the October 10, 2018 BBC Sports article .

2  
3 13. On October 10, 2018 the Irish Times reported the following statement by Peter  
4 Christiansen stated that, "Mr. Ronaldo will leave all future discussion of any and all legal matters  
5 to his attorneys here and in Europe." Attached hereto as *Exhibit 11 (AFFT 00052)* and  
6 incorporated herein by reference is the Irish Times article dated October 10, 2018.

7 14. On October 11, 2018 Calciomercato.com reported that the statements of Peter  
8 Christiansen, Esq. quoted by the press were released through Gestifute, an agency founded and  
9 managed by Ronaldo's lawyer Jorge Mendez. Attached hereto as *Exhibit 12 (AFFT 00055)* and  
10 incorporated herein by reference is a copy of the Calciomercato.com article dated October 10,  
11 2018.

12 15. On October 11, 2018 Der Spiegel reported:

13 Mayorga's lawyer says that criminal defense attorney David Chesnoff  
14 claims to be Ronaldo's legal representative in this case. On Wednesday  
15 night however , a new lawyer emerged publicly. The American attorney  
16 Peter S Christiansen published a statement through Gestifute, the agency  
17 that represents Ronaldo. In the statement Christiansen challenged Der  
18 Spiegel's coverage and claimed that significant portions of the  
19 documents were altered and/or completely fabricated.

20 The statement would seem to indicate that Ronaldo's lawyer have  
21 decided to pursue a defense strategy that they have used in response to  
22 unfavorable news coverage several times. When Der Spiegel published it's  
23 first story about the alleged rape and about the out-of-court settlement  
24 between Mayorga and Ronaldo in 2017, his advisers called the report  
25 "journalistic fiction". In Christiansen's most recent statement however  
26 he admits that a settlement exist and that Ronaldo agreed to it.

27 Attached hereto as *Exhibit 13 (AFFT 00059)* and incorporated herein by reference is a  
28 copy of the October 11, 2018 Der Spiegel article.

16. In September, 2018 the plaintiff was informed that the defendant retained David  
Chesnoff, Esq. to represent his interest in this matter. Attached hereto as *Exhibit 14 (AFFT  
00062)* and incorporated hereby reference is Mr. Chesnoff's letter dated October 3, 2018  
acknowledging representation of the defendant.

17. The plaintiff's retained process server contacted Mr. Chesnoff's office for service and



1 was informed he was not authorized to accept service on behalf of Cristiano Ronaldo. Attached  
2 hereto as **Exhibit 15** (AFFT 00065) and incorporated herein by reference is the November 14,  
3 2018 email from Norma McMahan, LPS general manager stating that defendant's lawyer Mr.  
4 Chesnoff was not authorized to accept service of process.

5 18. Subsequently, plaintiff was informed that Peter Christiasen Esq. was retained to  
6 represent Cristiano Ronaldo's interest in this matter. On November 14, 2018, LPS contacted Mr.  
7 Christiansen for service. Attached hereto as **Exhibit 16** (AFFT 00067) and incorporated herein by  
8 reference is the email from Norma McMahan, LPS general manager's attempt to reach and speak  
9 with the defendant's lawyer Peter Christiansen regarding accepting service of the summons and  
10 complaint.

11 19. On November 26, 2018 by letter Peter Christiansen, Esq. stated that he was not  
12 authorized to accept service of process and that his client expected service to comply with  
13 international law. Attached hereto as **Exhibit 17** (AFFT 00069) and incorporated herein by  
14 reference is a copy Peter Christiansen's letter dated November 26, 2018.

15 20. The defendant has a significant presence on the internet as a professional soccer  
16 player, a promoter of products including his CR7 line of businesses and his own image. On July  
17 10, 2018 Money reported in an article entitled Cristiano Ronaldo Is Worth A Staggering \$400  
18 Million: Here's How The Soccer Star Spends His Millions. that :

19 Ronaldo is one of the few athletes who has a lifetime contract with  
20 Nike –Michael Jordan and LeBron James are the only other two  
21 athletes with the same deal –worth around \$1 billion. which he signed  
in 2016.

22 He has so many endorsement deals and sponsorships – Tag Heuer,  
23 Herbalife, KFC, EA Sports, American Tourist are to name a few– that  
24 it's nearly impossible to keep track of all of them. according to Forbes.  
One of Ronaldo's most unusual partnerships is with Egyptian Steel, a  
steel company trying to gain a market share in Egypt.

25 The real Madrid player has his own clothing line called CR7 (his Real  
26 Madrid jersey number is seven), which includes everything from  
27 underwear and fragrances to kids clothing. He even has hotels branded  
under his CR7 line through the Pestano Lifestyle Hotels company.  
Forbes reports that Ronaldo also has plans to open restaurants in

1 Brazil.

2 And aside from his endorsements and sponsorship deals, he also has a  
3 free smart phone app called Cristiano Ronaldo: Kick and Run, as well  
4 as a selfie app that allows you to photoshop Ronaldo into your photos.  
He even has his own museum in his home country of Portugal called  
the Museu CR7.

5 Attached hereto as **Exhibit 18** (AFFT 00073-74) and incorporated herein by reference  
6 is a copy of the July 10, 2018 Money article.

7  
8 21. On August 23, 2016 AKSharit reported that the list of products endorsed by the  
9 defendant include: DAZN, Nike, CR7 Cristiano Ronaldo Luxury Underwear, CR7 Cristiano  
10 Ronaldo Footwear, CR7 Cristiano Ronaldo Blankets. Cristiano Ronaldo Legacy Fragrances,  
11 Pestana Hotel Group, Egyptian Steel, Herbalife, Clear Hair Products, Tag Heuer watches, Poker  
12 Stars, Abbott Laboratories, Save the Children Fund, American Tourister luggage, Panzer Glass,  
13 and Smaash Entertainment. Attached hereto as **Exhibit 19** (AFFT 00081-92) and incorporated  
14 herein by reference is a copy of the August 23, 2018 AKSharit article.

15 22. On February 23 , 2016 Forbes reported in an article entitled Cristiano Ronaldo Is First  
16 Athlete With 200 Million Social Media Followers that. "The social breakdown for Ronaldo is  
17 109.7 million fans on Facebook, 49.6 million on Instagram and 40.7 million on Twitter."  
18 Attached hereto as **Exhibit 20** (AFFT 00098-100) and incorporated herein by reference is a copy  
19 of the February 23, 2016 Forbes Article.

20 23. On July 10, 2018 Forbes reported in an article entitled Cristiano Ronaldo Takes A  
21 Wage Cut And Leaves For Real Madrid for Juventus. that:

22 Ronaldo is a one – man economy. thanks to his role as the dominant  
23 personality in the world's biggest sport. He has more than 300 million  
24 followers across Facebook, Twitter and Instagram, and his personal  
Facebook page alone has 122 million fans. 20 million more than any other  
person on the planet.

25 See **Exhibit 5** (AFFT 00021), a copy of the July 10, 2018 Forbes article.

26 24. Currently, the home page of Cristiano Ronaldo's Facebook states he has 122,700,450  
27 followers, Attached hereto as **Exhibit 21** (AFFT 000104) and incorporated herein by reference is  
28



1 a copy of the defendant's Facebook home page.

2 25. The home page of Cristiano Ronaldo's Twitter states he has 75,900,000 followers  
3 Attached hereto as **Exhibit 22** (AFFT 000106) and incorporated herein by reference is a copy of  
4 the defendant's Twitter Home page.

5 26. The home page of Cristiano Ronaldo's Instagram states he has 150 million followers.  
6 Attached here to as **Exhibit 23** (AFFT 000108) and incorporated herein by reference is a copy of  
7 the defendant's Instagram Home page.

8 27. In addition to promoting himself and sponsored products, the defendant has used  
9 these social media platforms to defend himself against charges of tax fraud and sexual assault,  
10 including plaintiff's complaint of sexual assault filed September 27, 2018 in the Clark County  
11 District Court.

12 28. Following local counsel's refusal to accept service of the summons and complaint on  
13 behalf of the defendant and the October, 2018 reporting that the defendant had arranged for  
14 housing in the area of Turin (Torino) Italy, the plaintiff instructed LPS to hire a process server in  
15 Italy to locate and confirm the defendant's place of the residence and to personally server of the  
16 summons and complaint on the defendant. To date LPS and the Italian process server have not  
17 been able confirm a residential address for the defendant or personally serve the defendant.  
18 Attached hereto as **Exhibit 24** (AFFT 000112-113) and incorporated herein by reference is a copy  
19 of the email from Norma McMahan, LPS manager in regards to the attempt to locate defendant  
20 residence in Turin (Torino) Italy.

21 29. The plaintiff hired Legal Process Service (LPS), a private process service company, to  
22 \determine the address of the defendant's residence in Turin, Italy, to personally serve the  
23 summons and complaint upon the defendant, and initiate service pursuant to Article 5 and 10(a)  
24 of the Hague Service Convention. The reporting by LPS of it's efforts on behalf of the plaintiff  
25 are summarized as follows:

26 a. November 14, 2018 – sorry for the delay but the tines are not prompt to  
27 respond. One of the servers had previously been in contact with said he

1 will not do it and refuses to send a server to the residents because of the  
2 private guards and their reputation. Attached hereto as **Exhibit 25** and  
3 incorporated herein by reference is the November 14, 2018 email from  
4 LPS.

5 b. November 15, 2018 – I heard back from a server in Italy. They said they  
6 will attempted but he was not really enthusiastic about having to go to the  
7 residents. I told him we wanted to servers, one to handle the  
8 delivery/service in another the video/photograph the delivery/service. I am  
9 waiting on his fee and will get back to when he replies. Attached hereto as  
10 **Exhibit 26** and incorporated herein by reference is the November 15, 2018  
11 email from LPS.

12 c. November 16, 2018 – please be advised that I have confirmation from  
13 server who will handle the request. You'll provide to servers, one to  
14 handle the service/delivery and the other to record the delivery. We all  
15 have to wired transfer the funds to them. Fee will run €1500. A little over  
16 \$1700. Please note this does not include wire transfer fees and LPS fee is  
17 \$225. Attached hereto as **Exhibit 27** and incorporated herein by reference  
18 is the November 16, 2018 email from LPS.

19 d. December 13, 2018 –also, on a side note, I have requested an update  
20 from the server in Italy regarding Ronaldo. I will update you as soon as  
21 possible. Also, Mr. Stovall also requested that I submit a second request  
22 for service on Ronaldo per page protocols. I will have a deposit invoice to  
23 you soon. As requested the docs have to be translated to Italian before we  
24 can do anything with the service. Attached hereto as **Exhibit 28** and  
25 incorporated herein by reference is the December 13, 2018 email from  
26 LPS.

27 e. December 14, 2018 –... Please note that I have to have an address for  
28 Ronaldo when submitting The Hague request. At this time, the only  
addresses I have for him or those associated with Juventus, the football  
club he plays for in Italy. I have addresses for the practice facility and Club  
Headquarters: however, I do not have a residence address. I have asked the  
server in Italy to provide me any and all addresses they find for him. I will  
keep you updated. However, if by the time, I am ready to submit The  
Hague package, if I have not received word of any additional dresses, then  
I will provide the (2) two addresses for Juventus. Please remember that  
service per Article 5 of The Hague, which is the standard most commonly  
sought service option will take four months or longer. Also, once service is  
submitted, the central authority is not required to provide status updates,  
so it is a wait and see. I will have a deposit invoice to you by early next  
week.

It is possible to utilize the service of an attorney in Italy. The Italian  
attorney has to petition the court for a service order. This alternate method  
per article 10 of The Hague bypasses the central authority. It usually  
means a faster service by a month or two; however, these usually start at  
about 3000 or higher. Attached hereto as **Exhibit 29** and incorporated  
herein by reference is the December 14, 2018 email from LPS.

1 f. January 3, 2019 – please advise it server in Italy is having to go through  
2 the terminus will government to get confirmation of Ronaldo's address.  
3 Server knows the location of the community, but the actual address is not  
4 known. I have received the deposit check for the fee associated to process  
5 the service via Hague Article 5 protocols; however, I too need the address  
6 before I can precede. I will keep you updated. Attached hereto as **Exhibit**  
7 **30** and incorporated herein by reference is the January 3, 2019 email from  
8 LPS.

9 g. January 17, 2019 – I have the translated docs. However, server in Italy is  
10 still trying to confirm Ronaldo's home address with the municipal  
11 government. If you prefer I do not wait, I can try substituting The Hague  
12 request by referencing (2) two addresses I have for Juventus football club,  
13 his employer. Please advise if you want me to proceed with the addresses  
14 for Juventus or if you prefer I wait a little longer to see if the time server  
15 can obtain physical address from municipal government in Turin. Attached  
16 hereto as **Exhibit 31** incorporated herein by reference is the January 7 team  
17 2019 email from LPS.

18 h. January 29, 2019 – regarding server in Italy, I am waiting to hear from  
19 them and will update you right away. But as of January 17, 2019 they are  
20 still trying to secure/confirm physical address. If you want I would like to  
21 instruct server to try the offices of Juventus to see if they will help and/or  
22 provide the name of an attorney for Ronaldo. Please note additional fees  
23 will more likely apply. Attached hereto as **Exhibit 32** and incorporated  
24 herein by reference is the January 29, 2019 email from LPS

25 i. January 29, 2019 – re: private server in Italy. They believe they have  
26 located the community where the defendant resides. The problem is that  
27 there is not a guard at the gate and entry is not possible. They have been  
28 attempting to secure a valid physical address for the defendant through  
municipal government but are having a lot of difficulty. Server said they  
would be providing another update soon.

Re: Hague service per Article 5. I had docs translated from English to  
Italian per my conversation with Ronald of January 7, 2019. Please note  
that in order to proceed with the Hague service I have to have an address.  
If you do not wish to continue to wait, I can submit the docs and indicate  
the addresses I found for Juventus Football Club. My hope is that the  
authorities who will be handling the service will be able to get information  
and/or cooperation from his employer. Again I'm hoping the business  
address will be enough to aid with certain the service.

There is also the possible option of going directly to the judicial  
official/officially Giudizario (party who normally serves process in Italian  
cases). However, it's my understanding that would require hiring an Italian  
counselor to prepare a service order. Attached hereto as **Exhibit 33** and  
incorporated herein by reference is the January 29, 2019 email from LPS.

j. January 30, 2019 – hi Ron, I will get quote to you an invoice for  
payment of translation fees and service fees for Hague service of the  
docks. Please note that because this is a different case, it will require a

1 separate handling from the case filed in the Eighth Judicial District Court,  
2 and additional fees will apply attached hereto as *Exhibit 34* and  
incorporated herein by reference is the January 30, 2019 email from LPS.

3 k. February 1, 2019 – server in Italy updated me. He has not had any luck  
4 confirming a home address and turn for Ronaldo. He said Juventus players  
are like royalty there. He said he can provide me the address for the  
5 community but not Ronaldo's personal residence. He said he is certain that  
Ronaldo is residing in the community. Server said that all efforts to  
6 confirm an address within the community were to no avail. He said records  
go blank when he searches anything for Ronaldo and when it comes to the  
7 community, property records have been blacked out or it is as if they do  
not exist. I asked server to run the name of Ronaldo's girlfriend and  
8 mother in an effort to see if perhaps he can get something on either. He  
said he would have something for me on that next week.

9 Server said they also attempted at the offices of Juventus. Server was told  
he could leave the docs and that they would forward them to Ronaldo's  
10 reps. Server did not leave copies.

11 Server is going to email me the address for the community. We can try  
mailing a copy of the documents to the community and hope that it makes  
12 it to the carrier for the community and that it eventually gets delivered to  
the correct address. Also, if you like, we can asked server to go back to  
13 Juventus to leave a copy of the documents there. As you can imagine, we  
cannot be sure what will be outcome of these efforts. Attached hereto as  
14 *Exhibit 35* and incorporated herein by reference is the February 1, 2019  
email from LPS.

15 30. By way of this application the plaintiff specifically seeks this court's  
16 order for publications in local newspapers of the summons in Las Vegas Nevada,  
17 and Turin (Torino) Italy.

18 31. Further, the plaintiff seeks an order for service by regular postal mail,  
19 fed express and email to the following business closely associated with the  
20 defendant, as an alternative and mailing to the defendant's residential address by  
21 the clerk of the court Legal Process Service (LPS) a private process service  
22 company or to the following:

23 **1. Jorge Mendez and Gestifute:**

24 **a)PORTO**  
25 **A. Praceta do Bom Sucesso 61**  
26 **Rooms 706/7/8**  
27 **4150-146 Porto**

P. +351 22 608 4455  
F. + 351 22 608 4459  
E. [gestifute@gestifute.com](mailto:gestifute@gestifute.com)

**b) LISBON**

A. Alameda dos Oceanos - Espace Building  
Lot 1.06.1.4 - Office 3.18  
1990-207 Lisbon  
P. +351 21 898 7070  
F. + 351 21 898 7079  
E. [gestifute@gestifute.com](mailto:gestifute@gestifute.com)

**c) GESTIFUTE MEDIA**

A. Praceta do Bom Sucesso 61  
Rooms 706/7/8  
4150-146 Porto  
P. +351 22 543 2642  
F. + 351 22 608 4459  
Copy: Manuela Brandão  
E. [media@gestifute.com](mailto:media@gestifute.com)  
Photos: Jorge Monteiro  
E. [photo@gestifute.com](mailto:photo@gestifute.com)

**d) POLARIS SPORTS**

A. Alameda dos Oceanos - Espace Building  
Lot 1.06.1.4 - Office 3.18  
1990-207 Lisbon  
P. +351 21 898 7070  
F. + 351 21 898 7079  
E. [info@polarissports.com.pt](mailto:info@polarissports.com.pt)  
W. <http://www.polarissports.com.pt>

**2. Juventus Soccer Club and Coach Massimiliano Allegri**

Via Druento, 175 10151  
Torino, Italy  
Email: [Info@juventus.com](mailto:Info@juventus.com)  
[www.juventus.com](http://www.juventus.com)

**3. Carlos Osorio de Castro**

**a) LISBON**

Rua Castilho, 165  
1070-050 Lisboa – Portugal  
T +351 213 817 400  
F +351 213 817 499  
[mlgtslisboa@mlgts.pt](mailto:mlgtslisboa@mlgts.pt)

**b) FUNCHAL, MADEIRA**

Av. Arriaga, n.º 73, 1.º, Sala 113  
Edifício Marina Club  
9000-060 Funchal – Portugal  
T +351 291 200 040

F +351 291 200 049  
[mlgtsmadeira@mlgts.pt](mailto:mlgtsmadeira@mlgts.pt) -

**c)Porto**  
Avenida da Boavista, 3265 – 5.2  
Edificio Oceanvs  
4100-137 Porto – Portugal  
T +351 226 166 950  
F +351 226 163 810  
[mlgtsporto@mlgts](mailto:mlgtsporto@mlgts).

**4. Christian Schertz**  
Schertz Bergmann Rechtsanwaelte  
Kurfürstendamm 53  
D-10707 Berlin  
Phone +49 30 880 01 50  
Fax +49 30 880 01 555

**5. Peter S. Christiansen, Esq.**  
810 South Casino Center Boulevard  
Suite 104  
Las Vegas, NV 89101  
[Email: pete@christiansenlaw.com](mailto:pete@christiansenlaw.com)

32. On December 28, 2018 LPS submitted an affidavit of due diligence to my office describing its efforts to locate the defendant's residence in Nevada and the United States and confirmed LPS had initiated service of process through the central authority designated by the Italian government for service of process pursuant Article 5 (a) of the Hague Service Convention. See *Exhibit 24*.

33. Plaintiff is seeking counsel in Italy to separately obtain orders of service of process from the Italian courts pursuant to Article 10 (a) of the Hague Service Convention. LPS advises this process may take 180 days.

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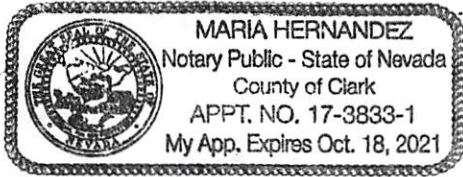
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1 Therefore I request an extension of time for service under Article 10 of the Hague  
2 Service Convention for 180 days. I have been advised that process can take 3 to 6  
3 months.

*[Handwritten signature of Leslie Mark Stovall]*



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LESLIE MARK STOVALL, ESQ.

SUBSCRIBED and SWORN to before me  
this 28 day of February, 2019.

*[Handwritten signature of Maria Hernandez]*  
NOTARY PUBLIC in and for said  
County and State